

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

WESTMOUNT GROUP, INC.

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CASE NO. 21-30633-hcm

CHAPTER 7

**SUPPLEMENTAL DECLARATION OF KEYVAN PARSA IN SUPPORT OF
MOTION TO DISMISS CHAPTER 7 CASE**

1. My name is Keyvan Parsa. I am over the age of 18 years and am fully competent to give this declaration. I have personal knowledge of the facts stated herein and they are true and correct.

2. I am the President of Westmount Group, Inc.

3. Please allow me to submit the below testimony in support of the Motion to Dismiss Chapter 7 case. I'm a victim of a vicious circle begun around January 20, 2021. My former attorney representing me at the state court denied my request to fight a baseless TRO imposed by my opponent, instead decided to agree to it without my consent! still as of today I'm unable to justify his action. My intention wasn't anyhow to disobey the state court order, The fund in question was already loaned out to an entity "Westmount Group" that wasn't part of any litigation and placed into a money market account, I understand that I had the control but breaking the money market account would have caused enormous penalties and I couldn't understand why Westmount Group a no party of lawsuit should be bounded to a TRO in which was affecting another entity being part of the actual lawsuit "Montoya Park Place". While the Westmount Group was slowly getting into the lending business, pressure was mounting to interpleader funds into the registry of court. I was really confused and in a desperate situation, I didn't know what to do! I shared the situation with at least two experienced attorneys, including the undeveloped Westmount Group's business status, no tax return, no employees, etc. however still I was advised in order to protect the funds chapter 11 needs to be filled. I am not an attorney and this was the first time I've heard of Chapter 11, and unfortunately I did it! As I've stated before, now I know Westmount Group wasn't eligible for any kind of bankruptcy and no one with a good knowledge of law and regulation would have committed to such an act deliberately leading to failure. My intention wasn't to disobey, trick, mislead anyone or have a new strategy or tactics, simply I was ignorant and naive. This is the truth!

4. Just a few days ago at the state court's deposition, I was present and after a few hours of cross examination both plaintiffs have realized that their claim is not as strong as they believed, and in a trial I have a great chance to win without any doubt. Your honor, I'm at

your mercy right now. Please don't let my life savings go to liquidation. I have suffered a lot already and especially learned my lesson in a hard way! I've tried many good attorneys in town to represent me but all have conflicts, and it's really weird! If I was represented adequately at the state court, I would have never ended up in this situation. Please give me a chance to fight my case at state court where everything has started. All we deserve a second chance.

5. Honorable Judge Mott, I obey your order without hesitation and will satisfy by all means the state court requests. I'm confident with God's will, the justice will be served at the end. Thank you, your Honor.

6. I declare the above and foregoing to be true and correct under penalty of perjury.

Dated: 11/16/2021



Keyvan Parsa
